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December 6, 2013

BY HAND DELIVERY

Jeff S. Jordan, Esq.
Supervisory Attorney
Complaints Examination & Legal Administration
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: RR 13L-42

Dear Mr. Jordan:

On behalf of David Alameel for Congress and Nadya Alameel, in her official capacity as Treasurer (collectively "Respondents"), we write in response to this referral by the Reports Analysis Division ("RAD"). The referral alleges that Respondents initially failed to disclose certain financial activity on reports filed with the Federal Election Commission (the "FEC" or "Commission"). The referral arose from Respondents' efforts to self-correct. They amended their reports on their own accord, have communicated frequently and forthrightly with Commission staff to resolve the issues involved, and now seek only to terminate the defunct campaign committee. To the extent that any further action is necessary in this matter, Respondents would seek the opportunity to promptly negotiate a resolution through the Alternative Dispute Resolution ("ADR") Program, with such resolution to include the Committee's termination.

Dr. Alameel was a first-time candidate for Congress in the 2012 primary election. He did not secure his party's nomination and his principal campaign committee, David Alameel for Congress (the "Committee"), awaits termination, having submitted what it had hoped to be its final report on January 30, 2013. None of those involved in the Committee's accounting and reporting had ever previously conducted a compliance program for a Federal political committee.

The referral in this matter concerns several amendments to the receipts and disbursements

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included on the Committee's 2011 Year-End, 2012 April Quarterly, 2012 12 Day Pre-Primary, 2012 July Quarterly, and 2012 October Quarterly Reports. Dr. Alameel heavily self-funded his campaign, so the significant changes to the receipts disclosed on the Committee's reports consist mainly of his own contributions. Similarly, the bulk of the disbursements added to the Committee's reports were for two large media purchases. The rest included standard campaign expenses, such as payments for contract labor and bank fees.

Moreover, Respondents repeatedly conferred with Commission staff while making the necessary changes to their reports. The referral in this matter details a number of conversations between Committee staff and the Committee's RAD Analyst, conducted as part of the Committee's efforts to ensure accurate disclosure of its activities and a complete public record. In addition to filing necessary amendments, the Committee also filed several detailed Miscellaneous Electronic Submissions on Form 99 to explain the circumstances that led to these amendments. As explained by the Committee, the amendments were the result of hiring a large number of campaign contractors, thereby requiring a large amount of checks to be cut and tabulated; automatic bank debits that were not originally accounted for; wire payments for media purchases that were not made through the normal check disbursement process; voided disbursements; and ultimately, some human error in the face of an extremely large number of transactions in a short period of time. At every turn, the Committee promptly worked to self-correct its reports, avoid future errors, consult with the Commission, and publicly explain exactly what had occurred with its reporting.

Respondents regret that the Committee's reports required correction. But they respectfully submit that enforcement action would be inappropriate here. The Committee acted reasonably to ensure that it met its reporting obligations under the Act, and any errors consisted solely of misreporting by a first-time candidate's campaign. The Committee took corrective action to ensure an accurate public record, and now that the record is correct, seeks only to terminate. For the foregoing reasons, if the Commission determines that any additional action is required, Respondents believe that a prompt resolution through ADR would be the appropriate course.

We appreciate the Commission's review of this response.

Very truly yours,



Brian G. Svoboda
Graham M. Wilson
Counsel to Respondents